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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FOREMOST SIGNATURE INSURANCE
COMPANY, a Michigan corporation duly
licensed to sell and administer insurance in
The State of Nevada,

Plaintiff,

Vs.

GMUENDER ENGINEERING, LLC, a Nevada
limited liability company; JOSEF C.
GMUENDER and JANE DOE GMUENDER,
husband and wife; MARY E. GMUENDER and
JOHN DOE GMUENDER, husband and wife;
WILLIAM HUBER, parent and guardian of
Ashley Huber and Taylor Huber, individually and
as surviving children of Kelly Huber, deceased;
GRANBY REALTY HOLDINGS, LLC, a
Colorado limited liability company; GRANITE
STATE INSURANCE COMPANY, an Illinois
corporation; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH
PA, a Pennsylvania corporation.

Defendants.

Case No. 3:19-cv-00508-MMD-CLB

**STIPULATION AND [PROPOSED] ORDER
FOR AMENDMENT TO THE
SCHEDULING ORDER**

(First Request)

(Assigned to the Honorable Miranda M. Du)

The parties, by and through undersigned counsel, hereby stipulate and agree to amend the scheduling order [ECF 37] to correct an error previously made with respect to the Rule 26(a)(3) disclosure deadline.

The Parties' last proposal for a scheduling order, which was granted, inadvertently listed today, May 21, 2020, as the pretrial disclosure deadline under Fed. R. Civ. P. 26(a)(3). [ECF 37]. This pretrial disclosure deadline is too early, because trial is not expected until after May 2021, as illustrated by the

fact that there is a May 28, 2021 deadline for the parties to file a proposed pretrial order. Also, the current pretrial disclosure deadline is premature because the discovery will still be open until December 18, 2020, which is many months away. Generally speaking, pretrial disclosures must be made “at least 30 days before trial” pursuant to Fed. R. Civ. P. 26(a)(3)(B). For these reasons, a deadline in early 2021 would be more appropriate.

Because the current May 21, 2020 was made far too early, the parties stipulate to amend the scheduling order to fix this erroneous deadline by changing it to **Wednesday, April 21, 2021**.

RESPECTFULLY SUBMITTED this 21st day of May 2020.

CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC

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ORDER

The Court, having reviewed the Stipulation and [Proposed] Order for Amendment to the Scheduling Order, and for good cause appearing:

IT IS HEREBY ORDERED that the May 21, 2020 Rule 26(a)(3) disclosure deadline is vacated and reset to April 21, 2021.

IT IS SO ORDERED.

Dated this 22nd day of May 2020.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of May 2020, service of the foregoing
**STIPULATION AND [PROPOSED] ORDER FOR AMENDMENT TO THE SCHEDULING
ORDER** was made upon each party in the case who is registered as an electronic case filing user with
the Clerk, pursuant to Fed. Rule civ. P. 5(b)(3), and Local Rule 5-4, and by electronic mailing as
follows:

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